

**SEAN D. COONEY, ESQ.**

NV Bar # 12945

# CARMAN COONEY FORBUSH PLLC

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Attnorneys for Defendant

State Farm Mutual Automobile Insurance Company

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KAREN BRAMWELL-TOMAS,  
individually

2:23-cv-01188-RFB-BNW

Plaintiff,

V.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, an entity licensed  
to do business in Nevada; DOES I through X;  
and ROE CORPORATIONS, XI through XX,  
inclusive

## Defendants

**STIPULATION TO EXTEND  
DISPOSITIVE MOTION AND  
PRE-TRIAL ORDER  
DEADLINES  
(THIRD REQUEST)**

Pursuant to Local Rule IA 6-1 and II 26-3, Defendant State Farm Mutual Automobile Insurance Company and Plaintiff Karen Bramwell-Thomas, by and through their respective counsel of record, stipulate to a 45-day extension of the dispositive motion and pre-trial order deadlines. This is the second such request

1 for an extension of these deadlines, and it is entered in good faith without any  
 2 intent to delay.

3                  Discovery Complete to Date

4                  1. Plaintiff served initial disclosures and four supplements thereto;  
 5                  2. Defendant served initial disclosures and two supplements thereto;  
 6                  3. The parties have conduct written discovery;  
 7                  4. Deposition of State Farm's 30(b)(6) designee;  
 8                  5. Deposition of Leann Grauer;  
 9                  6. Deposition of Plaintiff

10                 There is no further discovery to be completed, but the parties have scheduled  
 11 a mediation with Hon. Trevor Atkin at Advanced Resolution Management that is  
 12 set for February 3, 2025. The parties wish to avoid the expense of preparing  
 13 dispositive motions if the mediation is successful. Therefore, the parties have  
 14 stipulated to the following extension of the dispositive motion and pre-trial order  
 15 deadline.

16                 **Proposed Schedule**

17 <b>Deadlines</b>	18 <b>Current Dates</b>	19 <b>Proposed Dates</b>
Dispositive Motions	12/13/2024	3/7/2025
Pre-Trial Order	1/13/2025	4/7/2025

20                 All parties agree that the requested extension of the dispositive motion and  
 21 pre-trial order deadlines is necessary to provide all parties times to complete  
 22 discovery in this matter and have an opportunity to file any necessary motions.  
 23

1 DATED January 15, 2025

2 **CARMAN COONEY FORBUSH  
PLLC**

3

4

5 /s/ Sean D. Cooney

6 

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 SEAN D. COONEY, ESQ.  
7 Attorneys for Defendant  
State Farm Mutual Automobile  
Insurance Company

DATED January 15, 2025

**HENNESS & HAIGHT INJURY  
LAW**

/s/Dallin Knecht

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 MARK G. HENNESS, ESQ.  
STEPHEN J. MENDENHALL, ESQ.  
DALLIN KNECHT, ESQ.  
Attorneys for Plaintiff  
Karen Bramwell-Thomas

CARMAN COONEY FORBUSH  
PLLC

10 **ORDER**

11 IT IS SO ORDERED.



12  
13  
14 

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 RICHARD F. BOULWARE, II  
15 UNITED STATES DISTRICT JUDGE  
16

17 **DATED:** The 16th of January, 2025.  
18  
19  
20  
21  
22  
23

1                   **CERTIFICATE VIA CM/ECF**

2                   Pursuant to FRCP 5, I hereby certify that I am an employee of CARMAN  
3 COONEY FORBUSH, PLLC, and that on January 15, 2025, I caused to be served  
4 via CM/ECF a true and correct copy of the document described herein.

5                   **Document Served:**

6                   **STIPULATION TO EXTEND DISPOSITIVE MOTION AND PRE-TRIAL  
7 ORDER DEADLINES (THIRD REQUEST)**

8                   **Person(s) Served:**

9  
10                  Mark G. Henness, Esq.

11                  Stephen J. Mendenhall, Esq.

12                  **HENNESS & HAIGHT INJURY LAW**

13                  8872 Spanish Ridge Ave.

14                  Las Vegas, Nevada 89148

15                  Attorney for Plaintiff,

16                  Karen Bramwell-Thomas

17                  /s/Brittany Turner

18                  **CARMAN COONEY FORBUSH PLLC**

**Brittany Turner**

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**From:** Dallin Knecht <Dallin@hennessandhaight.com>  
**Sent:** Wednesday, January 15, 2025 3:10 PM  
**To:** Sean D. Cooney; Kelley Huff; Stephen Mendenhall  
**Cc:** Brittany Turner; KarenBramwellThomasZ6040023@projects.filevine.com  
**Subject:** Re: Bramwell-Thomas v SFMAIC

Hi Sean,

You can sign and file for me. Thanks.

-Dallin

---

**From:** Sean D. Cooney <seanc@cooneyforbush.com>  
**Sent:** Wednesday, January 15, 2025 9:20 AM  
**To:** Dallin Knecht <Dallin@hennessandhaight.com>; Kelley Huff <Kelley@hennessandhaight.com>; Stephen Mendenhall <StephenM@hennessandhaight.com>  
**Cc:** Brittany Turner <brittany@ccfattorneys.com>; KarenBramwellThomasZ6040023@projects.filevine.com <KarenBramwellThomasZ6040023@projects.filevine.com>  
**Subject:** RE: Bramwell-Thomas v SFMAIC

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Attached is a draft of the SAO to continue the deadlines. I know in Stephen's email that he propose 2/28 for the dispositive motion cutoff and 3/28 for the pre-trial order. But, I'm on vacation from 3/20 to 3/31, so I pushed everything out an additional week. Does that work?

Sean D. Cooney | Partner



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Our address and phone numbers remain the same.